

Internal Letter



Rockwell International

Date September 3, 1987

No.

WS-LT-00105
DB 30.52

TO (Name, Organization, Internal Address)

G. L. Potter
HS&E Operations Mgt.
Bldg.123

FROM

(Name, Organization, Internal Address, Phone)

G. H. Setlock
Environmental Mgt.
Bldg. T452B
2453

SUBJECT: WATER MANAGEMENT AT LANDFILL POND
NPDES PERMIT IMPLICATIONS

On September 1, 1987, I received a call from A. Ficklin (RCRA/CERCLA Programs) concerning the landfill pond. She wanted to discuss discharging this pond due to the high water levels. I informed her that this pond is not an NPDES discharge location and such a release would constitute an NPDES permit violation for the Rocky Flats Plant. She cited a conversation with you on NPDES emergency releases as a justification for discharging the landfill pond. The issue of removing the soil plug in the spillway was also raised. It was pointed out to A. Ficklin that the soil plug was installed by Environmental Management on April 9, 1987, as an interim precaution to preclude a certain NPDES permit violation, while Waste Operations personnel (i.e., G. Hewitt) worked to reduce the water levels in this pond.

Two water reduction options are available to Waste Operations - spray irrigation on adjacent landfill pond areas and discharge to another pond (i.e., Pond A-1). To date, the spray irrigation option has not been successfully pursued to the point of effectively reducing the high landfill pond water levels (due to abnormally high precipitation in 1987). The latter option (pumping to Pond A-1) is still viable and should be pursued to lower landfill pond water levels. R. Henry has been in routine contact with G. Hewitt to resolve this situation. When the pond water level is lowered sufficiently, the soil plug in the spillway will be removed. Engineering has expressed its concern with Environmental Management's interim precaution against an NPDES permit violation. Engineering's concern is that a 100-year flood event coupled with the blocked spillway could lead to the failure of the landfill pond. Although this may be a valid concern, I have made a temporary decision to preclude a certain event (i.e., NPDES permit violation) while accepting the risk of a low probability event (i.e., 100-year flood event precipitating the failure of the landfill pond). An assessment of all factors/options on this topic cannot justify any "emergency situation" where we should discharge this pond downstream at the expense of an NPDES permit violation. Water level problems with the landfill pond are atypical and are only being experienced this year due to abnormally high precipitation. My staff is monitoring this situation on a daily basis. It should be emphasized that the NPDES permit has not been violated by any of the actions taken (or planned) and none of the landfill pond water has entered Walnut Creek to date. Current plans are that Waste Operations will divert landfill pond water to Pond A-1 within two weeks or less.



000024632

1/2

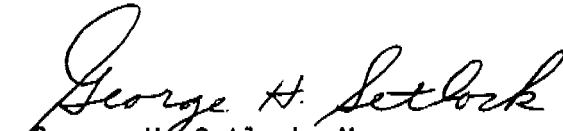
ADMIN RECORD

IA-A-000309

G. L. Potter
Page 2
September 3, 1987

DB 30.52

In summary, one issue is clear and another requires clarification. Discharge of water from the landfill pond would enter the Walnut Creek drainage and eventually enter Great Western Reservoir. The Rocky Flats NPDES permit does not allow discharges from the landfill pond, hence any planned or unplanned discharges will be violations of the Rocky Flats NPDES permit. This issue is clear, what is not clear is A. Ficklin's involvement/jurisdiction in the Rocky Flats NPDES permit and implementation process which has historically resided in the HS&E's Environmental Management section. At your convenience, I would like to meet and discuss A. Ficklin's role (if any) in NPDES permit management for the Rocky Flats Plant.


George H. Setlock, Manager
Environmental Management

cc:
N. M. Daugherty
R. L. Henry